

REPORT ON INSPECTION TO DETERMINE
COMPLIANCE WITH PCB REGULATIONS

Disc Environmental Services
151 East Andrus Road
Northwood, Ohio 43619

July 18, 2018

PERFORMED BY:

U.S. ENVIRONMENTAL PROTECTION AGENCY
PESTICIDES AND TOXIC SUBSTANCES BRANCH
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

PCB COMPLIANCE INSPECTION REPORT

I. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979, and as amended.

II. COMPANY IDENTIFICATION

Disc Environmental Services
151 East Andrus Road
Northwood Ohio 43619

RESPONSIBLE OFFICIAL

Patrick Kelley, President

III. DATE OF INSPECTION

July 18, 2018

IV. PARTICIPANTS

Company

Patrick Kelley, President
Henry Treece, Supervisor

U.S. EPA

Kendall Moore, Environmental Scientist

V. COMPANY BACKGROUND ☐ PCBs ☒ No PCBs discovered

Disc Environmental manages both hazardous and non-hazardous waste. They bring in approximately 1 million gallons of crankcase and spent lubricants a year using vacuum trucks to transport material from the generator's site to various disposal and recycling facilities.

VI. INSPECTION SUMMARY

Opening Conference

- A. The inspector(s) met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:

- ☒ Notice of Inspection
- ☒ TSCA Confidentiality Notice
- ☒ Receipt for Samples/Documents collected

These documents are enclosed as Attachment A and were signed by Patrick Kelley.

B. Circumstances Applicable to this inspection

- | | |
|--|---|
| <input checked="" type="checkbox"/> Disposal | <input type="checkbox"/> Processing |
| <input type="checkbox"/> Marking | <input type="checkbox"/> Distribution |
| <input type="checkbox"/> Storage | <input type="checkbox"/> Authorizations |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Record keeping |
| <input type="checkbox"/> None of the Above | |

C. CITATION

- ☒ Not Applicable
☐ Citation issued on
☐ Response received on

D. Closing Conference

- ☒ The inspector(s) explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office.

VII. SAMPLES/ PHOTOGRAPHS/ DOCUMENTS

- ☒ See Attachments as listed

VIII. ATTACHMENTS

- A. Notice of Inspection
TSCA Inspection Confidentiality Notice
Receipt for Samples and Documents

IX. INSPECTOR'S COMMENTS

- X Disposal Marking Use/Authorizations
 Storage Record keeping Manufacturing/
Processing Distribution Other

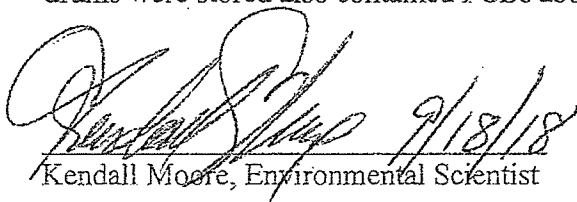
On or about April 17, 2018 Disc Environmental Services (Disc) delivered approximately 5,500 gallons of oily water to Usher Oil Company (Usher) using a hazardous waste manifest that describes the material as "other waste" (see attachment 2). Usher subsequently reported that the

oil contained PCBs with concentrations above the regulatory threshold of 50ppm. According to documents from Usher Oil, the 5,500 gallon shipment contained 98% water (see attachment 3).

Based on the information from Usher, Disc composited retain samples from each customer it picked up from to make up the 5,500 gallons that was delivered to Usher and analyzed the composite sample for PCBs. The result was non-detect for PCBs (see attachment 4). A sample of the composited material was collected during the inspection. The composited material retained by Disc was kept in a one liter glass container. The glass container was approximately half full of a clear liquid with the physical characteristics of water. EPA sample results of this material were also non-detect for PCBs (see attachment 5).

The inspector requested Generator Profiles of each of the customers that contributed to the 5,500 gallons given to Usher and after the inspection, Disc emailed that information to the inspector (see attachment 6).

One of the customers is Triple J Towing, a scrap yard that was subject to a Superfund site assessment in May of 2017. The Superfund report states Triple J Towing was storing several drums of waste with PCB concentrations over 50 ppm. Soil samples collected in areas where the drums were stored also contained PCBs above the regulatory threshold (see attachment 7).

 9/18/18
Kendall Moore, Environmental Scientist

ATTACHMENT 1



U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 7/18/18	INSPECTION NO. 7181801	DAILY SEQ. NO. 01	DTSC Environmental Services 151 E Andrus Rd Northwood, Ohio 43619
2. INSPECTOR'S ADDRESS USEPA 77 W. Jackson Blvd. Chicago, IL 60604			

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE 		RECIPIENT'S SIGNATURE 	
NAME Kendall Moore		NAME PATRICK L. KELLEY	
TITLE Env. Scientist	DATE SIGNED 7/18/18	TITLE President	DATE SIGNED 7/18/18